

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

League of Women Voters of Minnesota
Education Fund, Vivian Latimer Tanniehill,
Isabel Bethke, and Malea Marxer,

Plaintiffs,

v.

Steve Simon, in his official capacity as
Secretary of State of Minnesota,

Defendant,

and Donald J. Trump for President, Inc.,
Republican National Committee, and
Republican Party of Minnesota,

Intervenor-Defendants.

Civil Action No. 0:20-cv-01205-ECT-TNL

DECLARATION OF ISABEL BETHKE

Pursuant to 28 U.S.C. § 1746, I hereby declare as follows:

1. My name is Isabel Bethke. I am 28 years old and competent to make this declaration. The facts in this declaration are based on my personal knowledge. If called upon as a witness, I would testify to these facts.
2. I am a doctoral candidate in English literature at the University of Minnesota, Twin Cities ("UMN"), in Minneapolis, Minnesota. I moved to Minnesota from the Chicago area with my husband, Jan-Niklas Boyn, in August 2020 after enrolling in my doctoral program.
3. My husband and I got married in June 2020. He is also enrolled as a doctoral candidate in theoretical chemistry at University of Chicago. He is a German national, and he applied for U.S. citizenship in July 2020. His application is pending.

4. My husband and I live together in St. Paul, Minnesota. There are no other members of our household. My cousin and his family also live in Minneapolis, Minnesota, but we do not regularly see each other due to the pandemic.

5. Voting is important to me, so when I moved to Minnesota I made sure to register to vote right away. I submitted my voter registration application online on or around the first week of August 2020. Shortly thereafter, I received an incorrect voting registration confirmation card and realized that some of the information on my voter registration form had been filled out incorrectly, so I subsequently submitted a corrected voter registration form.

6. My voter registration was confirmed in mid-September 2020. I received a postcard from the Ramsey County Elections office with my voter registration information. I requested a mail ballot, which I received in early October 2020. With my mail ballot, I also received an envelope containing voter registration materials. I contacted the Ramsey County Elections office, and they told me that I needed to fill out and submit the registration form again. This was confusing because I had previously received a postcard confirming my registration. They did not give me a reason why I needed to re-register.

7. The envelope containing the registration materials indicated that I needed a signature from a witness to confirm my residency in order to register, and that the witness needed to be a Minnesota-registered voter.

8. Because my husband is not yet a U.S. citizen, he is not eligible to register to vote in Minnesota, and therefore could not witness my registration form. As new Minnesota residents, we did not know anyone else in Minnesota other than my cousin, and the COVID-19 pandemic made it challenging to meet new people. Despite the recommendations of public health officials to avoid contact with people outside my household, I had to go knock on my neighbors' doors to introduce

myself and ask if they would witness my registration form so that I could vote. On my third attempt, I was able to make contact with a neighbor who I had met previously and who was willing to witness my ballot.

9. Requiring me to find a neighbor to witness my ballot, rather than just having my husband witness the ballot for me, created an unnecessary burden for me. As a new Minnesota resident, my only option was to have a neighbor whom I did not know well witness my absentee ballot. This was especially challenging because the election occurred during the COVID-19 pandemic, when public health officials have urged Minnesotans to refrain from close personal contact with people outside our own households.

10. I am dedicated to advocating for my constitutional rights as well as the constitutional rights of others, including the right to vote. It is important to me to participate in and exercise my voice in the democratic process.

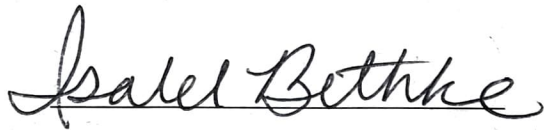
11. I know that thousands of other Minnesotans like me live in mixed-citizenship status households, and that their spouses or partners are not eligible to witness their absentee ballots.

12. If the witness eligibility requirement that prohibits non-citizens from serving as witnesses for absentee voting remains in place, it will create an unnecessary burden for me and other voters in mixed-citizenship status households. My husband's citizenship application is still pending, and until his application is approved, he cannot witness my ballot. If the two of us are traveling outside of Minnesota during the 2021 local elections or the 2022 gubernatorial and congressional elections, I do not know whether I will be able to find another registered Minnesota voter to witness my absentee ballot. Under Minnesota law, the only other option would be for me to pay a public notary to notarize my ballot, which would require me to spend money in order to exercise my constitutional right to vote.

13. Allowing my husband—or any other competent adult who is not a U.S. citizen or is otherwise not registered to vote in Minnesota—to witness my absentee ballot would allow me to exercise my right to vote without the burden of finding someone outside my household to do so.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on December 18, 2020 at St. Paul, Minnesota.

A handwritten signature in cursive script that reads "Isabel Bethke". The signature is written in black ink and is positioned above the printed name.

Isabel Bethke